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MASTROMARCO & JAHN, P.C.
Counsel to Cindy Palmer, Personal
Representative to the Estate of Michael Palmer
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Return Date: April 7, 2006
Time: 10:00 a.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

DELPHI CORPORATION, et al.,

Chapter 11
Case No. 05-44481 (RDD)
(Jointly Administered)

Debtors.

**NOTICE OF MOTION OF CINDY PALMER AS PERSONAL
REPRESENTATIVE OF MICHAEL PALMER, DECEASED FOR RELIEF
FROM THE AUTOMATIC STAY UNDER SECTION 362 OF THE
BANKRUPTCY CODE**

TO: See attached list

Cindy Palmer as Personal Representative of the Estate of Michael Palmer, Deceased, has filed a Motion for Relief from Automatic Stay Under Section 362 of the Bankruptcy Code which seeks a modification or termination of the stay to permit Movant to pursue an action as defined in the motion to Judgment and Collection.

HEARING ON THE MOTION WILL BE HELD ON

April 7, 2006 at 10:00 a.m.

You are required to file a response to the attached Motion on or before
March 31, 2006.

At the same time, you must also serve a copy of the response upon the
undersigned counsel:

Victor J. Mastromarco, Jr.
1024 N. Michigan Ave.
P.O. Box 3197
Saginaw, MI 48605-3197

The hearing date specified above may be a preliminary hearing or may be
consolidated with the final hearing as determined by the Court.

The attorneys for the parties shall confer with respect to the issues raised by
the Motion in advance for the purpose of determining whether a consent Judgment
may be entered and/or for the purpose of stipulating to relevant facts such as value
of property, and the extent and validity of any security instrument.

Dated: March 6, 2006

Respectfully submitted,

MASTROMARCO & JAHN, P.C.

s/ Victor J. Mastromarco, Jr.
Victor J. Mastromarco, Jr. (P34564)
Attorney for Movant